

William J. Goines (SBN 61290)
GREENBERG TRAURIG, LLP
1900 University Avenue, 5th Floor
East Palo Alto, CA 94303
Telephone: (650) 328-8500
Facsimile: (650) 328-8508
Email: goinesw@gtlaw.com

Attorneys for Defendants

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CYPRESS SEMICONDUCTOR CORPORATION,
a Delaware Corporation,

Plaintiff,

v.

DEUTSCHE BANK SECURITIES INC., a
Delaware Corporation, DEUTSCHE BANK ALEX.
BROWN, a Division of Deutsche Bank Securities
Inc., and DEUTSCHE BANK AG,

Defendants.

Case Number CV-11-617-JF

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO
COMPLAINT**

Honorable Jeremy Fogel

Plaintiff and Defendants, by and through their respective undersigned counsel, stipulate and agree as follows:

WHEREAS, on June 2, 2011, the Court So Ordered the parties' initial stipulation extending the time for Defendants to respond to the Complaint in this action to July 11, 2011; and

WHEREAS, on July 8, 2011, the Court So Ordered the parties' second stipulation extending the time for Defendants to respond to the Complaint in this action through and including August 24, 2011; and

WHEREAS the parties are presently discussing the possible resolution of this dispute and an additional thirty (30) days would facilitate those discussions; and

STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME FOR DEFENDANTS
TO RESPOND TO COMPLAINT - CV-11-617-JF

1 WHEREAS, accordingly, Defendants have met and conferred with Plaintiff and requested
2 an additional 30-day extension of the time for all Defendants to move against, answer or respond
3 to the Complaint (through and including September 23, 2011); and

4 WHEREAS, Plaintiff has consented to Defendants' request;

5 IT IS HEREBY STIPULATED, by and between Plaintiff and Defendants, through their
6 respective counsel, and subject to Court approval, that the time for all Defendants to move against,
7 answer or respond to the Complaint shall be extended from August 24, 2011 through and
8 including September 23, 2011.
9

10 In accordance with General Order 45 of the United States District Court for the Northern
11 District of California, I attest that concurrence in the filing of this document has been obtained
12 from the undersigned counsel.

13 DATED: August 22, 2011

Respectfully submitted,

14
15 By /s/ Philip J. Wang

Philip J. Wang (SBN 218349)

Justin S. Chang (SBN 205925)

16 WANG & CHANG, A PROFESSIONAL
17 LAW CORPORATION

18 One Maritime Plaza, Suite 825

San Francisco, California 94111

19 Telephone: (415) 599-2832

Facsimile: (415) 599-2829

20 phil@wangchangelaw.com

21 jchang@wangchangelaw.com

22 *Attorneys for Plaintiff*

23 By /s/ William J. Goines

24 William J. Goines (SBN 61290)

GREENBERG TRAURIG, LLP

25 1900 University Avenue, 5th Floor

East Palo Alto, CA 94303

26 Telephone: (650) 328-8500

Facsimile: (650) 328-8508

27 goinesw@gtlaw.com

28 - and -

Stephen L. Saxl (*Pro Hac Vice Motion
To Be Filed*)

Toby S. Soli (*Pro Hac Vice Motion
To Be Filed*)

GREENBERG TRAURIG, LLP

200 Park Avenue

New York, New York 10166

Telephone: (212) 801-9200

Facsimile: (212) 801-6400

saxls@gtlaw.com

solit@gtlaw.com

Attorneys for Defendants

ATTESTATION CLAUSE

I, William J. Goines, am the ECF User whose ID and password are being used to file this
STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT. In compliance with General Order 45, X.B., I hereby attest that
Philip J. Wang has concurred in this filing.


Date: August 22, 2011

GREENBERG TRAURIG, LLP

By: /s/ William J. Goines

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 9/1, 2011



The Honorable Jeremy Fogel
United States District Judge